

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**FILED**  
U.S. DISTRICT COURT  
INDIANAPOLIS DIVISION

**2015 SEP -3 PM 4:10**

SOUTHERN DISTRICT  
OF INDIANA  
LAURA A. BRIGGS  
CLERK

**RED BARN MOTORS, INC.,  
DONALD B. RICHARDSON, AND  
BARBARA A. RICHARDSON,**

**Plaintiffs,**

**v.**

**NEXTGEAR CAPITAL, INC.,  
as successor-in-interest to  
DEALER SERVICES CORPORATION,  
and LOUISIANA'S FIRST CHOICE  
AUTO AUCTION, L.L.C.**

**Defendants.**

**CIVIL**

**ACTION NO. : 1:14-cv-01589-TWP-DKL**

**MOTION TO APPEAR *PRO HAC VICE***

Now into Court, pursuant to S.D. Ind. R. 83-6, comes Cassie E. Felder who respectfully requests entry of an order granting leave to appear *pro hac vice* for the purpose of appearing as counsel on behalf of Red Barn Motors, Inc., Donald B. Richardson, and Barbara A. Richardson, in the captioned matter. In support of this motion, the undersigned states the following:

1.

I am admitted to practice and in good standing, i.e., currently authorized to practice as an attorney, in the following United States courts and Louisiana's highest court: Louisiana Supreme Court; United States Fifth Circuit; United States District Court, Middle District of Louisiana; United States District Court, Eastern District of Louisiana; and the United States District Court, Western District of Louisiana.

2.

I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any state of the United States. I have never received a reprimand or been subject to other disciplinary action from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

3.

I certify that I have reviewed the *Seventh Circuit Standards of Professional Conduct* and the Local Rules of this court, including the Rules of Disciplinary Enforcement, and that I will abide by these rules and standards.

4.

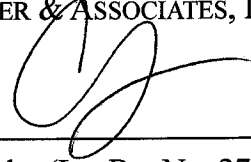
I have submitted a check in the amount of Thirty and 00/100 Dollars (\$30.00) to the Clerk of this Court in payment of the administrative fees required to process this motion for admission *pro hac vice*.

Wherefore, Cassie E. Felder respectfully requests that this Court enter an order granting leave to appear *pro hac vice* for the purposes of this cause only.

[CONTINUED ON FOLLOWING PAGE]

Respectfully submitted,

CASSIE FELDER & ASSOCIATES, L.L.C.



Cassie E. Felder (La. Bar No. 27805)

Joshua P. Melder (La. Bar No. 33983)

343 3<sup>rd</sup> Street, Suite 308

Baton Rouge, Louisiana 70801

Phone: (225) 448-3560

Fax: (225) 372-2862

Email: cfelder@felderllc.com

joshua@felderllc.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, on the 15<sup>th</sup> day of September, 2015, served a copy of the foregoing *Motion to Appear Pro Hac Vice* on all counsel of record via first-class U.S. Mail, postage prepaid and properly addressed to the following:

**Lisa Brener**

Brener Law Firm, L.L.C.

3640 Magazine Street

New Orleans, LA 70115

**David J. Jurkiewicz**

**Steven D. Groth**

Bose, McKinney & Evans, LLP

111 Monument Circle

Suite 2700

Indianapolis, IN 46204

\_\_\_\_\_  
Cassie E. Felder